THE RAMEAU LAW FIRM 16 Court Street, Suite 2504 Brooklyn, NY 11241

AMY RAMEAU, ESQ.\*

\*Admitted in New York, New Jersey, Eastern and Southern Districts of New York

JOSEPH RUSSO, ESQ.+

+Admitted in New York, Eastern District of New York

June 28, 2018

## **VIA ECF**

The Honorable Roanna L. Mann United States Magistrate Judge United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Raymond Tavares, et al. v. City of New York, et al., 17 CV 5221 (KAM)(RLM)

## Your Honor:

I represent plaintiffs in the above-referenced action and write to request that the Court modify its June 25, 2018 order to allow plaintiffs to obtain the defendants' personnel records and to conduct their depositions. All depositions are outstanding in this case, including the plaintiffs' depositions. When plaintiffs consented to the request to extend discovery, plaintiffs intended to use the extension to depose the defendants. Allowing plaintiffs to depose the defendants will not result in any harm or prejudice to the defendants. The extension of discovery granted on June 25, 2018 is the first granted by the Court. I thank the Court for its consideration of this request.

Sincerely,

Amy Rameau

Tel: (718) 852-4759

(718) 875-1173

Fax: (718) 875-5440